

FILED LK

4/12/2022

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ANTHONY HAYES
also known as "LA,"
JAMARI WILLIAMS,
also known as "Critta," and
REGINALD DANIELS

Violations: Title 18, United States Code,
Section 922(g)(1) and 922(o)(1)

1:22-CR-00219

JUDGE THARP
MAGISTRATE JUDGE MCSHAIN

COUNT ONE

The SPECIAL MAY 2021 GRAND JURY charges:

1. On or about August 9, 2021, REGINALD DANIELS was standing with Individual A in the parking lot of Store B in Calumet City, Illinois. At that time, DANIELS possessed a loaded Glock Model 22 .40-caliber pistol bearing serial number AESM464 in his waistband.
2. As DANIELS stood in the parking lot, ANTHONY HAYES, also known as "LA," and JAMARI WILLIAMS, also known as "Critta," ran into the parking lot of Store B carrying loaded Glock pistols, including a loaded Glock Model 23 .40-caliber pistol bearing serial number AAME726 and a loaded Glock Model 19 nine-millimeter pistol bearing a defaced serial number that was later restored to read BBEA866.
3. HAYES and WILLIAMS each fired multiple rounds at DANIELS and Individual A before running away. DANIELS and Individual A both sustained gunshot wounds.

4. DANIELS drew his pistol from his waistband and fired multiple rounds at HAYES and WILLIAMS as they ran away. One of DANIELS' shots missed HAYES and WILLIAMS, penetrated a car driving near Store B, and struck Individual C.

5. HAYES and WILLIAMS fled from Store B in a sport utility vehicle. After being pursued by law enforcement officers, HAYES and WILLIAMS abandoned the vehicle and fled on foot.

6. DANIELS discarded his Glock pistol into a garbage can inside Store B.

7. On or about August 12, 2021, law enforcement officers executed a search warrant at HAYES' residence in Dolton, Illinois. They recovered eight firearms, including the Glock pistols used by HAYES and WILLIAMS in the shooting of DANIELS and Individual A.

8. From on or about August 7, 2021, to on or about August 12, 2021, at Calumet City and Dolton, in the Northern District of Illinois, Eastern Division, and elsewhere,

ANTHONY HAYES, also known as "LA," defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely a loaded Glock Model 23 .40-caliber pistol bearing serial number AAME726, a loaded Glock Model 19 nine-millimeter pistol bearing a defaced serial number that was later restored to read BBEA866, a Palmetto State Armory Model PA-15 multi-pistol, bearing serial number SCD648620, a Palmetto State Armory Model PA-15 multi-pistol, bearing serial number SCD615453, a Smith and Wesson Model M&P-15 rifle, bearing serial number TS35197, a Glock Model 30Gen4 .45-

caliber pistol, bearing serial number BKXB277, a Sturm, Ruger & Co. Ruger 57 5.7-millimeter pistol, bearing serial number 642-03741, and a Smith and Wesson Model SD40VE .40-caliber pistol, bearing serial number FXU4829, and ammunition, namely three rounds of .40-caliber ammunition bearing the headstamp, "Sellier & Bellot 40 S&W," two rounds of .40-caliber ammunition bearing the headstamp, "CBC 40 S&W," one round of .40-caliber ammunition bearing the headstamp, "Hornady 40 S&W," nine rounds of nine-millimeter ammunition bearing the headstamp, "Hornady 9 mm Luger," two rounds of nine-millimeter ammunition bearing the headstamp, "Federal 9mm Luger," two rounds of nine-millimeter ammunition bearing the headstamp, "Hornady 9 mm Luger +P," one round of nine-millimeter ammunition bearing the headstamp, "Aguila 9 mm Luger," which firearm and ammunition had traveled in interstate commerce prior to defendant's possession of it;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

The SPECIAL MAY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 7 of Count One of this indictment are incorporated here.

2. On or about August 9, 2021, at Calumet City, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAMARI WILLIAMS, also known as "Critta," defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely a loaded Glock Model 23 .40-caliber pistol bearing serial number AAME726 and a loaded Glock Model 19 nine-millimeter pistol bearing a defaced serial number that was later restored to read BBEA866, and ammunition, namely three rounds of .40-caliber ammunition bearing the headstamp, "Sellier & Bellot 40 S&W," two rounds of .40-caliber ammunition bearing the headstamp, "CBC 40 S&W," one round of .40-caliber ammunition bearing the headstamp, "Hornady 40 S&W," nine rounds of nine-millimeter ammunition bearing the headstamp, "Hornady 9 mm Luger," two rounds of nine-millimeter ammunition bearing the headstamp, "Federal 9mm Luger," two rounds of nine-millimeter ammunition bearing the headstamp, "Hornady 9 mm Luger +P," one round of nine-millimeter ammunition bearing the headstamp, "Aguila 9 mm Luger," which firearm and ammunition had traveled in interstate commerce prior to defendant's possession of it;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE

The SPECIAL MAY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 7 of Count One of this indictment are incorporated here.

2. On or about August 9, 2021, at Calumet City, in the Northern District of Illinois, Eastern Division,

REGINALD DANIELS,

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely a loaded Glock Model 22 .40-caliber pistol, bearing serial number AESM464, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR

The SPECIAL MAY 2021 GRAND JURY further charges:

From on or about August 7, 2021, to on or about October 14, 2021, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ANTHONY HAYES, also known as "LA," defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely a loaded Glock Model 19 nine-millimeter pistol, bearing serial number AFBP000, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FIVE

The SPECIAL MAY 2021 GRAND JURY further charges:

From on or about August 7, 2021, to on or about August 12, 2021, at Calumet City and Dolton, in the Northern District of Illinois, Eastern Division, and elsewhere,

ANTHONY HAYES, also known as "LA," defendant herein, knowingly possessed a machinegun, as defined in Title 26, United States Code, Section 5845(b), namely (a) a loaded Glock Model 23 .40-caliber pistol bearing serial number AAME726, which firearm had been modified through a Glock Conversion Device, also known as a Glock switch, to shoot automatically more than one shot, without manual reloading, by a single function of the trigger, and (b) a Glock Conversion Device, also known as a Glock switch, recovered August 12, 2021, a part designed and intended solely and exclusively for use in converting a weapon into a machinegun;

In violation of Title 18, United States Code, Section 922(o)(1).

COUNT SIX

The SPECIAL MAY 2021 GRAND JURY charges:

From on or about August 7, 2021, to on or about October 14, 2021, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ANTHONY HAYES, also known as "LA," defendant herein, knowingly possessed a machinegun, as defined in Title 26, United States Code, Section 5845(b), namely (a) a loaded Glock Model 19 nine-millimeter pistol, bearing serial number AFBP000, which firearm had been modified through a Glock Conversion Device, also known as a Glock switch, to shoot automatically more than one shot, without manual reloading, by a single function of the trigger, and (b) a Glock Conversion Device, also known as a Glock switch, recovered October 14, 2021, a part designed and intended solely and exclusively for use in converting a weapon into a machinegun;

In violation of Title 18, United States Code, Section 922(o)(1).

FORFEITURE ALLEGATION

The SPECIAL MAY 2021 GRAND JURY further alleges:

1. The allegations contained in this Indictment are incorporated here by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of their violations of Title 18, United States Code, Section 922(g)(1) and 922(o)(1), as alleged in the foregoing Indictment,

ANTHONY HAYES, also known as "LA,"
JAMARI WILLIAMS, also known as "Critta," and
REGINALD DANIELS

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all right, title, and interest they may have in any property involved in and used in the charged offenses.

2. The property to be forfeited includes, but is not limited to: (1) a Glock Model 23 .40 caliber pistol bearing serial number AAME726; (2) a Glock Model 19 nine-millimeter pistol bearing serial number BBEA866; (3) a Palmetto State Armory Model PA-15 multi-pistol, bearing serial number SCD648620; (4) a Palmetto State Armory Model PA-15 multi-pistol, bearing serial number SCD615453; (5) a Smith and Wesson Model M&P-15 rifle, bearing serial number TS35197; (6) a Glock Model 30Gen4 .45 caliber pistol, bearing serial number BKXB277; (7) a Sturm, Ruger & Co. Ruger 57 5.7x28mm pistol, bearing serial number 642-03741; (8) a Smith and Wesson Model SD40VE .40 caliber pistol, bearing serial number FXU4829; (9) a Glock Model 22 .40

caliber pistol, bearing serial number AESM464; and (10) a Glock Model 19 nine-millimeter pistol, bearing serial number AFBP000, and associated ammunition.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY